

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION

UNITED STATES OF AMERICA)
)
 v.) Criminal No.: 5:20-CR-00003
)
KEITH ALLEN CONLEY)
)

STATEMENT OF FACTS

The parties stipulate that the allegations contained in the Indictment and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

On December 7, 2018, the RUSH drug task force conducted a controlled buy from Gary Wayne WOODSON utilizing a confidential informant ("CI"). The CI met WOODSON in front of a store in Harrisonburg, Virginia, where the two engaged in a hand-to-hand transaction. Harrisonburg is in the Western District of Virginia. The CI returned with .3071 grams of methamphetamines. WOODSON's suppliers of the methamphetamines were Keith Allen CONLEY and Kelly Evelyn DUDLEY, from whom he had purchased methamphetamines on multiple prior occasions.

On December 17, 2018, officers conducted a second controlled buy on WOODSON utilizing a CI, who this time used \$360 in prerecorded funds for the purchase. The buy occurred in front of another store in Harrisonburg. The CI returned with 3.97 grams of methamphetamines. After this buy, WOODSON entered the store. After a few minutes, WOODSON left the store and rode away in a taxi cab. Officers conducted a traffic stop on the taxi cab. During the stop, officers located and seized 4.25 grams of methamphetamines, a digital scale, and the \$360 in prerecorded funds that had just been used in the controlled buy. Officers arrested WOODSON. WOODSON's suppliers of the methamphetamines were CONLEY and DUDLEY.

That same evening, WOODSON agreed to conduct a controlled buy from CONLEY and DUDLEY at their hotel room at a Super 8 Motel in Harrisonburg. Officers supplied WOODSON with \$800 in prerecorded funds and an audio transmitter. During the buy, DUDLEY engaged in the hand-to-hand exchange with WOODSON while CONLEY laid on one of the beds in the motel room and was aware of the drug sale. WOODSON purchased 8.11 grams of pure methamphetamine. DUDLEY's two minor children were also present in the hotel room during the transaction.

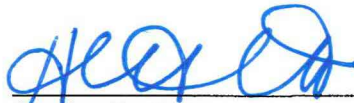
Defendant's Initials: KC

Officers later obtained a state search warrant for CONLEY's and DUDLEY's motel room. During the search, officers seized 13.458 grams of pure methamphetamines from various locations in the room, among other items including a loaded firearm, digital scales, cash, and the prerecorded funds used in the prior undercover purchase. The loaded firearm was located among various drug paraphernalia. DNA test results indicate the presence of CONLEY's DNA on the firearm. The key to the box from which the firearm was recovered was on a keychain clipped to one of CONLEY's belt loops.

Before CONLEY committed these offenses, he had a final conviction for a serious drug felony, namely, a conviction under Virginia Code § 18.2-248, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

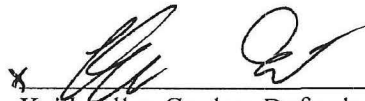
The actions taken by CONLEY as described above were taken willfully, knowingly, and with the specific intent to violate the law. CONLEY did not take those actions by accident, mistake, or with the belief that they did not violate the law. CONLEY acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Respectfully submitted,



Heather L. Carlton
Assistant United States Attorney

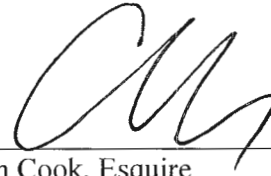
After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Keith Allen Conley, Defendant

I am Keith Allen Conley's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and
Defendant's Initials: ICC

voluntary one.

A handwritten signature in black ink, appearing to be 'AC', written over a horizontal line.

Aaron Cook, Esquire
Counsel for Defendant

Defendant's Initials: kc